

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON**

<b>IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL No. 2327</b>
<b>THIS DOCUMENT RELATES TO ALL CASES</b>	<b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>

**NOTICE OF INTENT**

Defendants Ethicon, Inc. and Johnson & Johnson (collectively “Ethicon”), by and through the undersigned counsel, hereby submit this Notice of Intent for the purpose of alerting the Court and liaison counsel for the Plaintiffs in MDL No. 2327 that Ethicon hereafter intends to file a motion to dismiss in the form of Exhibit A in each of the member cases listed in Exhibit B.

The plaintiffs in the member cases listed in Exhibit B have not submitted a complete Plaintiff Profile Form (“PPF”), as required by Pretrial Order # 17. Pretrial Order # 17 provides that “[i]f a plaintiff does not submit a PPF within the time specified in this Order, defendants may move immediately to dismiss the plaintiff’s case without first resorting to . . . deficiency cure procedures” set forth elsewhere in the Order. *See* Pretrial Order # 17 ¶ 1(g). Because the plaintiffs listed in Exhibit B have not submitted a PPF in accordance with Pretrial Order # 17, Ethicon intends to seek dismissal of their cases with prejudice.

Respectfully submitted,

ETHICON, INC. AND  
JOHNSON & JOHNSON

/s/ David B. Thomas

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**CERTIFICATE OF SERVICE**

I, David B. Thomas, certify that on November 22, 2013, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ David B. Thomas

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